

UNITED STATES DISTRICT COURT  
FOR THE DISTRICT OF SOUTH CAROLINA  
CHARLESTON DIVISION

IN RE: AQUEOUS FILM-FORMING FOAMS  
PRODUCTS LIABILITY LITIGATION

MDL No. 2:18-mn-2873-RMG

This Document relates to:  
ALL CASES

**UNOPPOSED MOTION TO EXTEND DEADLINE FOR REPLY TO MOTION FOR  
RECONSIDERATION OR CERTIFICATION FOR INTERLOCUTORY APPEAL  
BY HISTORIC DUPONT AND CHEMOURS**

Pursuant to Local Civil Rule 6.01, Defendants E. I. du Pont de Nemours and Company, The Chemours Company, and The Chemours Company FC, LLC (“Defendants”) move for an extension of time to reply to Plaintiffs’ response related to their Motion for Reconsideration or Certification for Interlocutory Appeal (the “Motion”). Defendants’ reply is currently due on Thursday, January 12. By this motion to extend, Defendants request two additional business days until Tuesday, January 17. This deadline has not been previously extended.

Plaintiffs’ response to the Motion raises numerous legal issues involving tens of thousands of documents on Defendants’ respective privilege logs related to Plaintiffs’ fraudulent transfer claims against these Defendants, and, in the alternative to reconsideration, seeks certification for interlocutory appeal and a stay of enforcement of portions of the Court’s December 1 Order. Defendants seek additional time to fully review and properly reply to these issues.

The extension would not affect the deadlines for any other parties or claims in this litigation. The Motion relates to a discovery order requiring the production of documents related to Plaintiffs’ fraudulent transfer claims against these Defendants. The Court has entered the Stipulation Regarding Fraudulent Transfer Claims Deadlines setting out a separate discovery deadline governing Plaintiffs’ fraudulent transfer claims. *See* CMO 23. The parties previously agreed that

they would seek an extension of the discovery deadlines after Plaintiffs' Motion to Compel was decided, *see* ECF 2329, in a motion that this Court granted by text order, ECF 2353. Plaintiffs' Motion to Compel was decided by an order of this Court dated December 1, 2022, which is subject to the Motion at issue herein. The extension would not affect any other deadlines in this litigation. *See* CMO 23 at ¶ 2.

For the reasons set forth above, Defendants respectfully move the Court for an extension of time until January 17, 2023, for Defendants to file their reply to the Motion. Undersigned counsel has conferred with Plaintiffs' counsel concerning the relief requested in this motion, and Plaintiffs do not object to such relief.

Dated: January 9, 2023

Respectfully Submitted,

/s/ Margaret Raymond-Flood

Martha N. Donovan  
Margaret Raymond-Flood  
NORRIS MCLAUGHLIN, P.A.  
400 Crossing Boulevard, 8th Floor  
Bridgewater, New Jersey 08807  
(908) 722-0755  
mdonovan@norris-law.com  
mraymondflood@norris-law.com

Steven DeGeorge  
ROBINSON BRADSHAW & HINSON  
202 East Main Street, Suite 201  
Rock Hill, South Carolina 29730  
(803) 325-2900  
sdegeroge@robinsonbradshaw.com

*Counsel for Defendants The Chemours  
Company and The Chemours Company  
FC, LLC (as to the Fraudulent Transfer  
claims)*

/s/ Katherine L.I. Hacker

Katherine L.I. Hacker (CO No. 46656)  
BARTLIT BECK LLP  
1801 Wewatta St., 12th Floor  
Denver, Colorado 80202  
(303) 592-3100  
kat.hacker@bartlitbeck.com

Katharine A. Roin (IL No. 6302872)  
BARTLIT BECK LLP  
54 W. Hubbard St.  
Chicago, Illinois 60654  
(312) 494-4400  
kate.roin@bartlitbeck.com

Alice W. Parham Casey (Fed. I.D. #9431)  
WYCHE, P.A.  
807 Gervais St., Suite 301  
Columbia, South Carolina 29201  
(803) 254-6542  
tcasey@wyche.com

*Counsel for Defendant E. I. du Pont de  
Nemours and Company (as to the Fraudulent  
Transfer Claims)*

**CERTIFICATE OF SERVICE**

A true and correct copy of the foregoing was electronically filed with this Court's CM/ECF system on January 9, 2023, and accordingly served automatically upon all counsel of record for this matter.

/s/ Katherine L.I. Hacker  
Katherine L.I. Hacker